

Notice of Violation Pursuant to Requirements  
of the Resource Conservation and Recovery Act (RCRA)

TO: Facility Name: Bayer Healthcare Animal Health Inc.  
Address: 5909 + 5920 Corporate Drive  
St. Joseph, MO  
EPA ID Number: MDR 000513945 + MDR 000520817 Date: 1/14-15/14

This notice is provided to call your attention to the following areas of noncompliance with state and federal regulations. This notice does not constitute a compliance order (Administrative Civil Complaint) pursuant to Section 3008 of RCRA and may not be a complete listing of all violations resulting from the the inspection.

Citation <sup>as incorporated</sup> in Missouri State Regulations

Description of Violation

- |                                                 |                                                                                                        |
|-------------------------------------------------|--------------------------------------------------------------------------------------------------------|
| ① 40 CFR 262.11                                 | Make a hazardous waste determination on containers listed in Attachment #1                             |
| ② 40 CFR 262.34(a)(2) and (3)                   | Undated unlabeled storage container of 4135 hydrogen sulfide bottle in 5909 490 day area               |
| ③ 40 CFR 265.173(a) and 10 CSR 25-5.262(2)(C)3. | Open, unlabeled and undated satellite area containers listed on Attachment #2                          |
| ④ 40 CFR 262.34(d)(5)(ii)(A)+(B)                | Emergency Coordinators names not updated on Posted Emergency info and emergency equipment not included |
| ⑤ 40 CFR 262.34(d)(5)(iii)                      | Employees not trained on waste handling and emergency procedures                                       |
| ⑥ 40 CFR 265.37                                 | No arrangements made with the local authorities                                                        |

You are requested to submit a written response within 14 calendar days of receipt of this notice. Your response should include a description of all corrective actions taken and/or a schedule for completing the necessary corrective actions. The response should be submitted to:

U. S. Environmental Protection Agency, Region VII  
300 Minnesota Ave  
Kansas City, KS 66101  
ATTN: Dedriel Newsome

If you have any questions about this Notice or wish to discuss your response, you may call me at (913) 551-7049, or Deborah Bredehoff (Compliance Officer) at (913) 551-7614.

This Notice prepared by Dedriel Newsome Date: 1/15/14

The undersigned person acknowledges that he/she has received a copy of this Notice and has read same.

Printed Name: Pat Hamall Date: 15 Jan 2014  
Signature: Pat Hamall  
Title: manager maintenance, Engineering & Utilities

Attachment 6 Page 1 of 1 plus Attachment #1 (1pg)  
Attachment #2 (1pg)  
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